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March 1, 2024

Mark D. Marini, Secretary  
Department of Public Utilities  
One South Station, 5<sup>th</sup> Floor  
Boston, MA 02110

Re: SMART Low-Income Annual Report – D.P.U. 24-DG

Dear Secretary Marini:

On behalf of NSTAR Electric Company d/b/a Eversource Energy (“Eversource”), Massachusetts Electric Company and Nantucket Electric Company, each d/b/a National Grid (“National Grid”) and Fitchburg Gas and Electric Light Company d/b/a Unitil (“Unitil,” together, the “Distribution Companies” or “EDCs”), enclosed for filing is the EDCs’ third annual report to the Department of Public Utilities (“Department”) on the participation of low income customers in the SMART program.

On December 30, 2021, the Department issued an Order on Phase I Revisions to the Model SMART Provision, and directed the EDCs to, among other things, submit data regarding the participation of low-income customers in the SMART Program on an annual basis. Revised Model Solar Massachusetts Renewable Target Program Provision, D.P.U. 20-145-B at 24 (2021) (“Order”). Specifically, the Order directed the EDCs to provide individually, and in the aggregate, an informational filing by March 1 each year, identifying: (1) the number of customers that receive compensation under the SMART Provision as a Low Income Customer as defined under the SMART regulations and SMART Provision (i.e., “[a]n End-use Customer that is on a low-income discounted rate of a Distribution Company or a resident in a Low Income Eligible Area”); and (2) of those customers, the number of customers that take service under the low-income discount rate (i.e., rate R-2).

Attached is a report of the applicable data, based on Final Statement of Qualifications (“Final SoQs”) that were issued to SMART Program applicants in each EDC’s service territory during 2023 or earlier. The table below includes customers that received SMART incentive payments and/or bill credits as: (1) Low Income Customers on residential rate R-2; and (2) residential customers in Low Income Eligible Areas. Individual EDC figures are also included in the enclosed report.

In the process of developing the report among the EDCs and in collaboration with DOER, the EDCs determined that some customers listed on LICSS credit allocation sheets would not meet the definition of a Low-Income Customer based on residence in a Low Income Eligible Area. For purposes of this report the EDCs are reporting the counts of customers as they are listed on the

LICSS credit allocation sheets pending further review by DOER as part of annual compliance audits for this class of projects.

In addition, the EDCs note that there is another group of low income participants in the SMART program not represented in the table below -- Low Income Property Solar Tariff Generation Units (“STGUs”). Such a facility could be on a commercial rate, and may not have individual customer accounts to list (e.g., a master-metered residential property) but “provides all of its generation output in the form of electricity or bill credits to low or moderate income housing, as defined under M.G.L. c. 40B.” To date, four Low Income Property STGUs have received a Final SoQ in National Grid’s service territory, and twenty six Low Income Property STGUs have received Final SoQs in Eversource’s service territory.

**Aggregated EDC Totals**

<b>Category</b>	<b>R-2 Customers</b>	<b>Low Income Area Customers</b>	<b>Total</b>
Low Income STGUs	2129	13	2142
Low Income Community Shared Solar Offtaker*	1910	650	2560

\*Note, LICSS provide credits to non-low income offtakers, not shown in this report.

Thank you for your attention to this matter. Please contact me if you have any questions regarding this filing.

Sincerely,



Ashley S. Marton, Esq.

Enclosure

cc: Andrew Strumfels, Hearing Officer  
John K. Habib, Esq.  
Laura Bickel, Esq.  
Matthew Campbell, Esq.

**National Grid Totals**

<b>Category</b>	<b>R-2 Customers</b>	<b>Low Income Area Customers</b>	<b>Totals</b>
Low Income STGUs	1,281	13	1,294
Low Income Community Shared Solar Offtaker*	674	272	946

\*Note, LICSS provide credits to non-low income oftakers, not shown in this report.

**National Grid (Massachusetts Electric Company)**

<b>Category</b>	<b>R-2 Customers</b>	<b>Low Income Area Customers</b>	<b>Total</b>
Low Income STGUs	1,278	13	1,291
Low Income Community Shared Solar Offtaker*	674	272	946

\*Note, LICSS provide credits to non-low income oftakers, not shown in this report.

**National Grid (Nantucket Electric Company)**

<b>Category</b>	<b>R-2 Customers</b>	<b>Low Income Area Customers</b>	<b>Total</b>
Low Income STGUs	3	0	3
Low Income Community Shared Solar Offtaker*	0	0	0

\*Note, LICSS provide credits to non-low income oftakers, not shown in this report.

**Eversource Totals**

<b>Category</b>	<b>R-2 Customers</b>	<b>Low Income Area Customers</b>	<b>Total</b>
Low Income STGUs	806	0	806
Low Income Community Shared Solar Offtaker*	1,236	378	1,614

\*Note, LICSS provide credits to non-low income oftakers, not shown in this report.

**Unitil Totals**

<b>Category</b>	<b>R-2 Customers</b>	<b>Low Income Area Customers</b>	<b>Total</b>
Low Income STGUs	42	0	42
Low Income Community Shared Solar Offtaker*	0	0	0

\*Note, LICSS provide credits to non-low income oftakers, not shown in this report.

